

## **REMARKS/ARGUMENTS**

This Amendment responds to the Office Action dated July 31, 2008 in which the Examiner rejected claims 1-6, 8-17 and 19-21 under 35 U.S.C. § 103.

As indicated above, claims 1, 8, 13 and 19-21 have been amended in order to make explicit what is implicit in the claims. The Amendment is unrelated to a statutory requirement for patentability.

By compressing audio/video data in units of a compression block having a first data length and then encrypting the compressed data into a plurality of units having a second data length smaller than the first data length as claimed in claims 1, 8, 13, 19-21, the claimed invention provides an apparatus, system and method in which a processing load to access data is reduced since there are no breaks between encryption blocks. The prior art does not show, teach or suggest the invention as claimed in claims 1, 8, 13 and 19-21.

Claims 1, 3-4, 6, 13, 15-16 and 21 were rejected under 35 U.S.C. § 103 as being unpatentable over *Yoshiura, et al.* (U.S. Patent No. 6,157,720) in view of *Keith* (U.S. Patent 5,615,020).

*Yoshiura, et al.* appears to disclose compressing a symbol of plaintext data to transform the symbol (bit train) of the plaintext data into a compressed bit train. If the amount of compressed data is greater than or equal to a block size, the block of the compressed data is encrypted (column 4, lines 38-49).

Thus, *Yoshiura, et al.* merely discloses that once the block size is filled with compressed data, the block of compressed data is then encrypted. Nothing in *Yoshiura, et al.* shows, teaches or suggests encrypting the compressed data into a plurality of units having a length smaller than

the compression block length as claimed in claims 1, 13 and 21. Rather, *Yoshiura, et al.* teaches away from the claimed invention since the block of the compressed data is encrypted as a block.

*Keith* appears to disclose Huffman encoding to achieve a compression factor of between 1 and 1.5-2 times (column 1, lines 22-25).

Thus, *Keith* only discloses a compression factor for compressing data. Nothing in *Keith* shows, teaches or suggests encrypting the compressed data into a plurality of units having a second data length smaller than the compression block data length as claimed in claims 1, 13 and 21. Rather, *Keith* only discloses a compression factor for compressing data.

A combination of *Yoshiura, et al.* and *Keith* would merely suggest that when the data is compressed to fit the block size in *Yoshiura, et al.*, the compression factor of *Keith* is used. Thus, nothing in the combination of the references shows, teaches or suggests encrypting the compressed data into a plurality of units as claimed in claims 1, 13 and 21. Therefore, Applicants respectfully request the Examiner withdraws the rejection to claims 1, 13 and 21 under 35 U.S.C. § 103.

Claims 3-4, 6 and 15-16 recite additional features. Applicants respectfully submit that claims 3-4, 6 and 15-16 would not have been obvious within the meaning of 35 U.S.C. § 103 over *Yoshiura, et al.* and *Keith* at least for the reasons as set forth above. Therefore, Applicants respectfully request the Examiner withdraws the rejection to claims 3-4, 6 and 15-16 under 35 U.S.C. § 103.

Claims 2 and 14 were rejected under 35 U.S.C. § 103 as being unpatentable over *Yoshiura, et al.* and *Keith* and further in view of *Bellovin, et al.* (U.S. Patent No. 5,241,599). Claims 5 and 17 were rejected under 35 U.S.C. § 103 as being unpatentable over *Yoshiura, et al.* and *Keith* and further in view of *Yuenyongsgool, et al.* (U.S. Patent No. 6,202,152).

Applicants respectfully traverse the Examiner's rejection of the claims under 35 U.S.C. § 103. The claims have been reviewed in light of the Office Action, and for reasons which will be set forth below, Applicants respectfully request the Examiner withdraws the rejection to the claims and allows the claims to issue.

As discussed above, since nothing in *Yoshiura, et al.* and *Keith* show, teach or suggest the primary features as claimed in claims 1 and 13, Applicants respectfully submit that the combination of the primary references with the secondary references to *Bellovin, et al.* or *Yuenyongsgool, et al.* will not overcome the deficiencies of the primary references. Therefore, Applicants respectfully request the Examiner withdraws the rejection to claims 2, 5, 14 and 17 under 35 U.S.C. § 103.

Claims 8, 10-11 and 19-20 were rejected under 35 U.S.C. § 103 as being unpatentable over *Yoshiura, et al.* in view of *Keith* and further in view of *Bahout* (U.S. Patent No. 5,594,793).

As discussed above, *Yoshiura, et al.* merely discloses compressing symbols until the compressed data reaches a block size and then encrypting the block. Nothing in *Yoshiura, et al.* shows, teaches or suggests encrypting compressed data into a plurality of units having a second data length smaller than the compression block data length as claimed in claims 8 and 19-20. Rather, *Yoshiura, et al.* teaches away from the claimed invention and encrypts the (entire) compression block.

Furthermore, as discussed above, *Keith* only discloses a Huffman encoding having a compression factor between 1 and 1.5-2 times. Nothing in *Keith* shows, teaches or suggests encrypting compressed data into a plurality of units having a second data length as claimed in claims 8 and 19-20. Rather, *Keith* only discloses a compression factor for an encoding.

*Bahout* appears to disclose computing an encrypted password as a function of identification data element to verify compatability between a manufacturers password and a key contained in a memory (column 7, lines 1-16).

Thus, *Bahout* merely discloses verifying compatability between a password and a key contained in a memory. Nothing in *Bahout* shows, teaches or suggests encrypting compressed data into a plurality of units having a second data length as claimed in claims 8 and 19-20. Rather, *Bahout* only discloses verifying compatability.

A combination of *Yoshiura, et al.*, *Keith* and *Bahout* would merely suggest that when data is compressed to fit the block size in *Yoshiura, et al.*, the compression is done using the compression factor as taught by *Keith* and in addition to verify compatability as taught by *Bahout*. Thus, nothing in the combination of the references shows, teaches or suggests encrypting compressed data into a plurality of units having a second data length as claimed in claims 8 and 19-20. Therefore, Applicants respectfully request the Examiner withdraws the rejection to claims 8 and 19-20 under 35 U.S.C. § 103.

Claims 10-11 recite additional features. Applicants respectfully submit that claims 10-11 would not have been obvious within the meaning of 35 U.S.C. § 103 over *Yoshiura, et al.*, *Keith* and *Bahout* at least for the reasons as set forth above. Therefore, Applicants respectfully request the Examiner withdraws the rejection to claims 10-11 under 35 U.S.C. § 103.

Claim 9 was rejected under 35 U.S.C. § 103 as being unpatentable over *Yoshiura, et al.*, *Keith* and *Bahout* and further in view of *Bellovin, et al.* Claim 12 was rejected under 35 U.S.C. § 103 as being unpatentable over *Yoshiura, et al.*, *Keith* and *Bahout* and further in view of *Yuenyongsgool, et al.*

Applicants respectfully traverse the Examiner's rejection of the claims under 35 U.S.C. § 103. The claims have been reviewed in light of the Office Action, and for reasons which will be set forth below, Applicants respectfully request the Examiner withdraws the rejection to the claims and allows the claims to issue.

As discussed above, since nothing in the combination of the primary references shows, teaches or suggests the primary features as claimed in claim 8, Applicants respectfully submit that the combination of the primary references with the secondary references to *Bellovin, et al.* or *Yuenyongsgool, et al.* will not overcome the deficiencies of the primary references. Therefore, Applicants respectfully request the Examiner withdraws the rejection to claims 9 and 12 under 35 U.S.C. § 103.

Thus, it now appears that application is in condition for a reconsideration and allowance. Reconsideration and allowance at an early date are respectfully requested. Should the Examiner find that the application is not now in condition for allowance, Applicants respectfully request the Examiner enter this Amendment for purposes of appeal.

**CONCLUSION**

If for any reason the Examiner feels that the application is not now in condition for allowance, the Examiner is requested to contact, by telephone, the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this case.

In the event that this paper is not timely filed within the currently set shortened statutory period, Applicants respectfully petition for an appropriate extension of time. The fees for such extension of time may be charged to Deposit Account No. 50-0320.

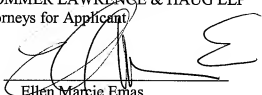
In the event that any additional fees are due with this paper, please charge our Deposit Account No. 50-0320.

Respectfully submitted,

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